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Hon. Joan Azrak
United States Courthouse
100 Federal Plaza
Central Islip, New York 11722
BY ECF

Re: United States v. Khaimov
20 Crim. 267 (JYA)

Dear Judge Azrak:

We are the attorneys for Arkadiy Khaimov, the above named defendant. Mr. Khaimov pleaded guilty on August 12, 2020. He is currently scheduled to be sentenced on July 26, 2021. I am writing to request an adjournment of the sentencing proceeding.

As I am sure your honor is aware, Mr. Khaimov is a defendant in another matter, US v. Khaimov S1 20 Crim. 580 (AMD). Last week, the government filed a superseding indictment. The new indictment has expanded a case already designated as a complex matter and additional discovery has just been provided that is extensive. Mr. Khaimov is currently detained at the M.D.C. and it is difficult to review the voluminous discovery with him.

Obviously, the new indictment presents complicated sentencing issues that need to be addressed. Mr. Khaimov's exposure on the superseding indictment and the impact of its filing need to be carefully considered in preparing our sentencing memorandum in the matter pending before your honor.

We are, therefore, requesting an adjournment of the sentencing proceeding until sometime in November. The Jewish high holy days and the ensuing holidays conclude at the end of October. We request that sentencing be scheduled after the holidays.

Mr. King, the assistant assigned to this case, has no objection to this request.

Very truly yours.
/s/

ISABELLE A. KIRSHNER